

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : Bankruptcy No. 14-22325 JAD
Andrea N. Bullock, :
Debtor, :
Deutsche Bank National Trust Company, : Chapter 13
Movant, : Doc. No.
v. :
Andrea N. Bullock, and : Related to Doc. No. 121
Ronda J. Winnecour, Chapter 13 Trustee, : Response due: 08/12/16
Respondents. :

DECLARATION THAT CHAPTER 13 PLAN IS SUFFICIENT
WITH THE PAYMENT CHANGE

And now comes the Debtor, by and through her attorney, Francis E. Corbett, and respectfully represents as follows:

1. The Notice of Payment Change describes a small payment increase from \$650.63 to \$659.69.
2. The plan is adequately funded to cover this increase.
3. The payment of \$659.69 should be incorporated into the plan as of September 1, 2016.

Respectfully Submitted,

Date: 07/26/16

s/ Francis E. Corbett
Francis E. Corbett, Esquire PA I.D. #37594
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310 Grant Street, Suite 1420
Pittsburgh, PA 15219-2230
(412) 456-1882

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**CERTIFICATE OF SERVICE OF DECLARATION THAT THE
CHAPTER 13 PLAN IS SUFFICIENT
WITH THE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties on the attached list via NECF on July 26, 2016.

Ronda J. Winnecour, Chapter 13 Trustee at cmeccf@chapter13trusteewdpa.com
Office of the U.S. Trustee at ustpregion03.pi.ecf@usdoj.gov
Andrew F. Gornall, Esquire agornall@goldbecklaw.com

The type of service made on the debtor and the party listed below was First Class Mail.

JP Morgan Chase Bank, N.A.
Attn: Rochelle Johnson
700 Kansas Lane
Monroe, LA 71203

EXECUTED ON: 07/26/16

s/Francis E. Corbett
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